

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

YOLANDA E. BROWN

Plaintiff,

V.

Case No. 1:18-CV-03126-ELR

QUIKTRIP CORPORATION

Defendant.

**DEFENDANT QUIKTRIP CORPORATION’S MOTION FOR SUMMARY
JUDGMENT**

COMES NOW Defendant QuikTrip Corporation (hereinafter “QuikTrip”),
by and through counsel, and files this its Motion for Summary Judgment pursuant
to Fed. R. Civ. P. 56 and L.R. 56.1. QuikTrip states that there is no genuine issue
of material fact and no evidence supporting there existed a hazard, nor evidence
supporting any breach of duty by QuikTrip, and thus it is entitled to summary
judgment as a matter of law. In support of this Motion, QuikTrip relies upon the
deposition of Yolanda Brown; the affidavit of Jasmin Blagajcevic; the Customer

Incident Report including photographs; surveillance video from “employee parking”; all pleadings of record; and its Brief in Support of its Motion for Summary Judgment.

This 26th day of April, 2019.

Respectfully submitted,

/s/ Nicole C. Leet
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QuikTrip Corporation

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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2019, copies of **DEFENDANT QUIKTRIP CORPORATION'S MOTION FOR SUMMARY JUDGMENT** were electronically served with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to the following attorneys of record:

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This 26th day of April, 2019.

/s/ Nicole C. Leet
Nicole C. Leet
Georgia Bar No. 133044
Attorney for Defendant
QuikTrip Corporation